

Office of the Standing Chapter 13 Trustee
105 Decker Ct
Suite 1150 11th Floor
Irving, TX 75062
(214) 855-9200

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**IN RE:
PAULINE CORONADO-NEWTON
DEBTOR**

CASE NO: 20-33047-HDH-13

TRUSTEE'S AMENDED OBJECTION TO CONFIRMATION

Now comes the Standing Chapter 13 Trustee herein and files this "Objection to Confirmation" of the Plan, filed herein by Debtor, and would respectfully show the Court as follows:

The Trustee asserts that the Plan does not meet the requirements of 11 U.S.C. §1325(a)(6), which is known as the "feasibility test."

- Debtor is delinquent on Plan payments.
- The Trustee requests ytd 2021 P&L's showing actual income and expenses. The P&Ls provided are insufficient and Trustee requests proof of expenses and income received.

Trustee requests a Profit and Loss Statement for Debtor 1 from Jan 2021 to March 2021 and corresponding bank statements to determine feasibility.

The Trustee asserts that the Plan has not been proposed in good faith per 11 USC Section 1325(a)(3) or 1325(a)(7).

- Debtor should surrender interest in 2018 Ford Ecosport as it is not necessary for an effective reorganization.

WHEREFORE, the Standing Chapter 13 Trustee prays that said Plan not be Confirmed unless and until it has been modified to cure all objections set forth herein above, and for general relief.

Respectfully submitted,
THOMAS D. POWERS, CHAPTER 13 TRUSTEE

By: /s/ Tara Tankersley

Tara Tankersley
State Bar No. 19636900
Attorney For Tom Powers
105 Decker Ct
Suite 1150 11th Floor
Irving, TX 75062
(214) 855-9200
Fax: (214) 965-0758

Trustee's Objection To Confirmation, Page 2
Case # 20-33047-HDH-13
PAULINE CORONADO-NEWTON

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Trustee's Objection To Confirmation** was served on the following parties at the addresses listed below by United States First Class Mail and/or by electronic service .

Debtor: PAULINE CORONADO-NEWTON, 2805 N BRITAIN ROAD, IRVING, TX 75062

Attorney: LEINART LAW FIRM, 10670 N CENTRAL EXPRESSWAY, SUITE 320, DALLAS, TX 75231**

Creditor(s): SYNCHRONY BANK, PRA RECEIVABLES MANAGEMENT, PO BOX 41021, NORFOLK, VA 23541

VAUGHT FIRM LLC, 1910 PACIFIC AVE, STE 9150, DALLAS, TX 75201

WILCOX LAW PLLC, PO BOX 201849, ARLINGTON, TX 76006**

**Indicates party has elected to receive all notifications via electronic service and was not served a copy via United States First Class Mail.

Dated: April 05, 2021

By: /s/ Tara Tankersley